

EXHIBIT 70

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONNA CURLING, ET AL.,)
)
Plaintiffs,)
)
vs.) CIVIL ACTION NO.
)
BRAD RAFFENSPERGER, ET) 1:17-CV-2989-AT
AL,)
)
Defendants.)

THIS DEPOSITION CONTAINS INFORMATION DESIGNATED
CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER

VIDEOTAPED 30(b)(6) DEPOSITION OF RICHARD BARRON
(Taken by Plaintiffs)
January 31, 2022
10:07 a.m.

Reported by: Debra M. Druzisky, CCR-B-1848

1 A. Just with Fulton County or all of it?

2 Q. All of it that's relevant, do you believe,
3 to election administration --

4 A. Okay.

5 Q. -- representing companies that are
6 involved in --

7 A. Sure.

8 Q. -- the manufacture or sale of election
9 equipment.

10 A. Yeah. So I've been with Fulton County
11 since June of 2013 as director. Prior to that I
12 was with Williamson County, Texas as the elections
13 administrator from February of '07 until June of
14 2013.

15 I was with Hart InterCivic in 2006 for
16 that entire year, from January 1st to the end of
17 the year. Before that, I was with Sequoia Voting
18 Systems from April of 20 -- April of 2004, I think,
19 to the end of 2005.

20 And then from December of '99 until April
21 of 2004, I was with Williamson Count -- or with
22 Travis County elections as election management
23 coordinator. And with Hart and Sequoia I -- Hart I
24 was an account manager, with Sequoia I was a
25 regional project manager.

1 Q. I was just -- I was on the actual stage
2 just before the actual printing. I was under the
3 impression that the voter had some opportunity to
4 look at the screen to look at their selection
5 before the printing.

6 Is that correct?

7 A. Yes.

8 Q. Okay. And then the B.M.D. prints a paper
9 record; is that correct?

10 A. Yes.

11 Q. Describe for me what's on that paper
12 record.

13 A. The selections that the voter made when
14 the voter voted. And then what it -- when they hit
15 "cast ballot," that's what prints out.

16 Q. And that record has a Q.R. code on it?

17 A. Does it have a Q.R. -- I don't even
18 remember if it has a Q.R. code or a barcode. I
19 don't know. It's got a Q.R. code or a barcode on
20 it.

21 Q. What do you recall what's on a ballot
22 produced by a B.M.D. voting machine in the Fulton
23 County election in the year 2020?

24 A. I don't remember if it's a barcode or a
25 Q.R. code. I think it's a barcode.

1 Q. Okay. And describe for the record, is the
2 barcode something that a voter could read to des --
3 to confirm whether or not that it would -- properly
4 recorded their vote?

5 A. No.

6 Q. Okay. And is there a text portion of the
7 ballot that's been printed as well?

8 A. Yes. The ballot is printed out for the
9 voter to review, and it looks like a ballot, like a
10 paper ballot.

11 Q. Okay. And then the paper ballot is walked
12 over to a scanner?

13 A. Yes.

14 Q. And then fed into the scanner?

15 A. Yes.

16 Q. And then the vote is -- the ballot is
17 stored electronically on the scanner?

18 A. Yeah. The record -- yeah, the ballot is
19 read by the scanner, and then it drops into a
20 ballot box and the record of that -- of those votes
21 is recorded on the scanner in the on -- and there's
22 a flash card in there to record or store all of it
23 as well.

24 Q. Now, let's start with the poll pad. The
25 poll pad is loaded by WiFi?

1 A. Yes.

2 Q. And those are -- that's a WiFi system
3 maintained at the Fulton election center on English
4 Avenue?

5 A. Yes.

6 Q. And how often do the poll pads have to be
7 updated prior to an election so that the
8 information reflected on them is current?

9 A. Oh, the bulk file is loaded on the
10 Saturday before Election Day.

11 Q. Okay.

12 A. There are updates that are done, I think
13 O.S. updates that are done on those in the -- maybe
14 in the days leading up to it. The new -- I think
15 there's going to be a new process coming soon where
16 there's going to be every -- I think almost, not
17 every day, but several days leading up to it the
18 voter record is going to be updated so that the
19 Saturday upload isn't as bulky, doesn't take as
20 long.

21 Q. It's a logistical challenge to update
22 everything on that Saturday before the election,
23 isn't it?

24 A. Yes. Because, yeah, the State requires us
25 to do something that's unnecessary, and it's,

1 frankly, dumb what they ask us to do, which is to
2 put the entire statewide voter file on the poll
3 pads. There's no reason for it.

4 And KNOWiNK can site -- can cordon off a
5 boundary around your county to get around that, but
6 they don't do it. The don't do it because the
7 State won't let them.

8 Q. Have you made this recommendation to them
9 in the past?

10 A. I've mentioned it, I think, in
11 conversation, but they don't care.

12 Q. Why don't they care?

13 A. Because they --

14 MS. LAROSS: I object to the form of
15 the question.

16 THE WITNESS: They know best.

17 BY MR. KNAPP:

18 Q. Do they offer a reason why that approach,
19 which would lighten the load on Fulton County's
20 poll pad updating, isn't to their liking?

21 A. No.

22 Q. Now, how is the software on the B.M.D.s
23 loaded?

24 A. It's updated with a U.S.B. stick.

25 Q. And where does that U.S.B. stick come

1 from?

2 A. That'll come from the -- we get all of our
3 election files or election project from the State
4 center for election systems.

5 Q. And do -- does Fulton County do any kind
6 of scan or other inspection of those sticks to see
7 whether or not they've been tampered with or
8 contain any malware?

9 A. No. I mean, the county doesn't do that,
10 no. We get those -- those are delivered -- either
11 we pick them up ourselves or they are delivered by
12 the State to us, and they're sealed, and then we
13 use them from there. And they go to direct cust --
14 the custody is from the State to the county.

15 Q. In the June 2020 election, when was the
16 software updated into the B.M.D.s by this method?

17 A. Well, it would have -- I mean, that --
18 it -- once we start logic and accuracy testing,
19 that starts. I don't remember when the exact date
20 would have been.

21 But it's usually the ballots are prepared
22 sometime six to eight weeks, they're available six
23 to eight weeks before the Election Day, and then we
24 start doing logic and accuracy testing.

25 Q. In 2020 how many precincts were in Fulton

1 election center that touches the election
2 equipment?

3 A. No.

4 Q. The poll pads?

5 A. Well, yeah, the poll pads get connected to
6 it. They get connected via Meraki devices, which
7 are secure WiFi access points. And those are what
8 the information from the bulk -- the bulk files
9 transmitted through those and through a cache box,
10 and then they go into the -- into the poll pads.

11 Q. And you mentioned again the bulk file
12 upload. What's that?

13 A. That's -- the bulk file?

14 Q. The bulk file upload is what you referred
15 to, yes.

16 A. That's the voter -- that's the voter list
17 for the State, the statewide voter list. And it's
18 updated with everyone who's voted early or
19 requested an absentee ballot or returned an
20 absentee ballot.

21 Q. And when is that done?

22 A. The Saturday before Election Day. But the
23 poll pads aren't part of the voting system.

24 Q. Correct. That's the check-in system;
25 correct?

1 A. Yeah.

2 Q. Well, other than they create a card that
3 then is taken and put into the B.M.D.s; is that
4 correct?

5 A. Yes. Yeah, they have -- the only
6 information on the card is that there's just -- it
7 just gives you access to a ballot, a ballot style.

8 Q. Has Fulton County ever done an assessment
9 or evaluation as to whether or not information on
10 those cards is vulnerable or accessible to attack?

11 A. No. Not that I'm aware of.

12 Q. These -- is that metracall (Phonetically)
13 devices? I'm sure I mispronounced it. Explain
14 what they are and what function they perform.

15 A. Which devices?

16 Q. You -- they -- you said there were certain
17 devices that --

18 A. Devices, they're just, they're basically
19 WiFi access points, and I -- from my understanding
20 is that they're much more secure than a normal WiFi
21 access point.

22 I don't know if they encrypt the data. I
23 don't know technically what it is. But they're
24 used because they have, I think, much higher
25 security standards with them. Other than that, I

1 a poll pad before it got to a polling place?

2 A. No.

3 Q. Is there any concern about protecting that
4 delivery such that that doesn't happen?

5 A. No. I mean, you -- we're handing -- we
6 hand them out on Sundays to the poll managers, who
7 have put them in, you know, they put them in their
8 cars, either take them to the poll -- you know,
9 it's the same -- it's probably a -- you know, I
10 don't know.

11 I would assume that our delivery probably
12 makes it a more direct process than having the poll
13 managers come pick them up. But the process is
14 just to hand them out on Sundays anyway to the poll
15 managers.

16 Q. Is that process common among the other
17 metro counties?

18 A. Yeah. I mean, I would -- it's common
19 across the country for some sort of process along
20 those lines to happen.

21 Q. Okay. Let's go to topic number four:

22 "Any execution or operational
23 issues or challenges with Georgia's
24 current election system, including any
25 Fulton County 2020 or 2021 elections,

1 polling sites, there were too many machines plugged
2 in to the same outlets for -- and were overloading,
3 you know, the circuit on a certain -- a certain
4 electrical circuit would get un -- overloaded. So
5 yeah, that, that did happen.

6 As far as equipment issues, I don't -- I
7 don't think there were really any issues with the
8 B.M.D.s that were caused by the B.M.D.s. I think
9 it was more just either electricity or just poll
10 workers not understanding what they needed to do.

11 Q. Who was responsible for training the poll
12 workers on this new equipment?

13 A. Johnny Harris and Blake Evans were.

14 Q. And what role, if any, did the Secretary
15 of State play in preparing them to train these
16 folks?

17 A. I mean, we all, we received training from
18 Dominion in December on the equipment. And then we
19 had to get -- I mean, it took us -- it took a lot
20 for us to get the State to produce any kind of poll
21 worker manual on the system.

22 I mean, we essentially had to bug the
23 State, you know, kind of tell them, look, this, we
24 think this is your responsibility to come up with a
25 poll worker manual for the State. They didn't

1 really seem to have any sense of urgency about
2 that.

3 But other than that, I mean, the State was
4 pretty hands-off when it came to the system. We
5 got -- we got some short training with Dominion.
6 They provided a basic poll worker manual. And then
7 we had the big, thick Dominion manual, so we had
8 to, you know, come up with a -- with a manual for
9 training.

10 You know, fortunately, most of it was
11 done -- we started training people before the
12 presidential preference primary. But you know, we
13 were -- during -- it was during early voting when
14 we shut that election down, so most of the election
15 workers didn't receive any in-person training. And
16 that was really the main problem.

17 With the -- as far as the electrical, the
18 State was -- had -- I think they, if I remember
19 right, they had contracted with someone to go out
20 and check electrical, they did -- to do an electric
21 at survey at polling places. And I'm thinking it
22 was all before the June election that they were
23 supposed to have done that.

24 I know that after the June election Fulton
25 County went out and we surveyed everything. We

1 figured out which outlets in all of those polling
2 places were the ones that had to be used so that
3 poll workers would, you know, no longer have
4 problems with electricity.

5 Q. How long did it take the State to prepare
6 the poll workers manual?

7 A. I don't remember. I think we got it
8 sometime in February, maybe the latter part of
9 February in 2020, which was just weeks before
10 the -- it was pretty close to when early voting
11 started for the March election.

12 Q. Did the Secretary of State prepare Fulton
13 County for the different burdens that would be on
14 it as a result of using this new system that the
15 State had elected to purchase?

16 MS. LAROSS: I object to the form of
17 the question.

18 THE WITNESS: Did they prepare us?

19 BY MR. KNAPP:

20 Q. Yes.

21 A. You know, I mean, they provided the
22 Dominion training. You know, with the pandemic the
23 way it was, I'm not really sure -- you know, I'm
24 not sure what could have been done at that point.

25 But you know, I mean, obviously looking

1 State himself common to the other counties as well
2 to your knowledge?

3 A. No.

4 MS. LAROSS: Objection to the form of
5 the question.

6 THE WITNESS: Not from my
7 conversations with other directors.

8 BY MR. KNAPP:

9 Q. And what did you learn from other
10 directors about the pattern of communications their
11 offices had with the Secretary -- with
12 Mr. Raffensperger?

13 A. I just -- I mean, they told me that they,
14 you know, some of them have had -- some of them
15 have regular contact with him in some form or
16 fashion. I don't know if it's phone calls or
17 whatever.

18 But you know, they either will be invited
19 to things or they will -- or they'll be, you
20 know -- I don't know what -- on what occasions they
21 speak to him, but it seems to me that there are at
22 least some regular conversations that happen
23 sometimes between him and some of the other
24 counties.

25 Q. Do you have any understanding as to why

1 the Fulton County experience was different than
2 these other counties?

3 A. I can speculate as to --

4 MS. LAROSS: Objection as to form.

5 THE WITNESS: -- that but, you know,
6 that's -- all I can do is just speculate
7 on it. So I only know him from, you know,
8 what he says and what he has his people
9 say about us and the adversarial
10 relationship he likes to have with us.
11 So.

12 BY MR. KNAPP:

13 Q. Is the adversarial relationship helpful to
14 your mission to conduct elections within Fulton
15 County?

16 A. No.

17 MS. LAROSS: Objection as to form.

18 THE WITNESS: No. But I also think
19 the whole set-up in Georgia, which is --
20 seems to be unique to Georgia, is -- just
21 creates that atmosphere, the State
22 Election Board, the investigations of the
23 counties, the punitive punishments from
24 the State Election Board, binding things
25 over to the attorney general, these types

1 of things.

2 I mean, you know, the other states in
3 which I've worked, you know, the Secretary
4 of State's office is there as a helpful
5 resource to the counties. And you
6 definitely -- I don't think you can say
7 that is the case in Georgia.

8 And I think the State Election
9 Board's relationship with the counties is
10 nothing but adversarial. And it's -- you
11 know, I don't know what you want to call
12 it. They're like kangaroo court sessions.
13 But that's, you know, here in Georgia
14 that's -- you just have to deal with it.

15 BY MR. KNAPP:

16 Q. And do you have specific examples of such
17 dealings with the Secretary -- the State Election
18 Board in Fulton County?

19 A. Well, I think, you know, you -- your -- a
20 complaint comes in, an investigator does a
21 complaint, they present it at the State Election
22 Board. Sometimes you get notice a week ahead of
23 time of what's coming.

24 You don't even -- you might not even have
25 any records left because every two years you

1 election went extraordinarily well, even better
2 than November.

3 Q. One could almost say flawless.

4 A. Yeah.

5 Q. And again, talking about new procedures,
6 had there ever been an R.L.L. -- R.L. audit of an
7 election before, of a presidential election?

8 A. We -- no. I mean, we had done a pilot of
9 a -- of an R.L.A., and it was pretty simple. And
10 we were set up to -- you know, we were going to --
11 we were told by the State that they were going to
12 pull about 250 to 275 ballots for our risk-limiting
13 audit for the November election, and then it turned
14 out we had to count every one by hand.

15 Q. Are those the kind of surprises that gives
16 you, people like you a nightmare?

17 A. What, a full -- a full hand count of an
18 election?

19 Q. Well, after expecting an R.L.A. of only
20 270,000 votes to suddenly ramp up to have to count
21 every vote?

22 A. Well, I mean, it wasn't --

23 MS. LAROSS: Object to the --

24 THE WITNESS: We weren't --

25 MS. LAROSS: -- form of the question.

1 Excuse me, Mr. Barron. Go ahead.

2 THE WITNESS: Yeah, no, it was like
3 275 ballots we were going to have to
4 count.

5 BY MR. KNAPP:

6 Q. Oh.

7 A. And we had to count 527,000. So yeah, it
8 was a -- it was stunning. Especially knowing that,
9 even if we did that hand count, that with the
10 margin of victory that Biden had we were going to
11 have to do the machine recount anyway, and that
12 Trump would request the machine recount even though
13 we just did the hand count, it just seemed to me to
14 be a complete waste of resources.

15 It cost us almost 900,000 dollars, I
16 think, to do that hand audit.

17 Q. Who ended up paying that?

18 A. The County.

19 Q. And then let's see here.

20 A. And the tool that we were given to record
21 all the counting was just -- I -- it can't be
22 termed as anything but a complete joke.

23 Q. Explain what those tools were, and explain
24 what would be a much more legitimate and -- way to
25 go about that task.

1 A. Well, we got a piece of software called
2 Arlo. And it was not built for this. You -- we
3 were only given one user, permission for one user.
4 And so every county got permission for one user no
5 matter the size. And we had to enter all of the
6 batch sheets.

7 After somebody -- after teams of two would
8 count, they would turn in a batch sheet with their
9 totals on it, and those would have to be entered.
10 And when you would enter it, the system would just
11 spin like it -- you know, like, when Apple has the
12 little twirly --

13 Q. Hourglass?

14 A. (Inaudible due to cross-talk).

15 Q. Uh-huh.

16 A. It will -- it just will be non-responsive.
17 And so somebody would just enter the information
18 again without realizing that the system had already
19 probably accepted the previous entry.

20 And there was also no search feature in it
21 unless -- the only way you could search for
22 something is if you -- you had to know how the
23 batch number and the description was entered
24 previously.

25 And if you -- if you didn't know whether

1 it was upper case or lower case, if you just put in
2 all lower case and it had been entered upper and
3 lower, you would not get anything out of your
4 search result.

5 So trying to go back and do any
6 reconciliation was almost impossible. I mean, we
7 finally just had to -- it was just not built for --
8 that system was not built for what -- for the
9 purposes for the counties to use it for a hand
10 audit.

11 Q. This was --

12 A. So it was very hard to record all of the
13 information afterwards. It would have been better
14 just to do an express -- an Excel spreadsheet.

15 Q. Interesting.

16 Who selected the software?

17 A. The State.

18 Q. What input, if any, did they ask of you or
19 your office in making that selection?

20 A. I don't think they consulted with any
21 counties on it. That's from what I've been told
22 from other counties.

23 Q. Do you have any understanding why they
24 thought this tool would be sufficient to perform
25 this task?

1 Q. Okay. Are we ready?

2 A. Yes.

3 Q. As you see, exhibit -- topic nine starts
4 on Page 7, carries over to Page 8. Tell me, what
5 knowledge, if any, do you have of any evaluation,
6 study, investigation or assessment of the
7 integrity, security or vulnerability of the
8 Georgia's current election system or its prior
9 G.E.M.S./D.R.E. election system?

10 A. This is at the top of number nine? This
11 is topic number nine, you said?

12 Q. Yes, sir.

13 A. Hello?

14 Q. Yes. Can you not hear me? It's the
15 top -- topic number nine in the paragraph, full
16 paragraph at the top of number nine.

17 A. Oh, the paragraph before number nine?

18 Q. No. The actual -- well, it's all -- it's
19 all one and the same. The paragraph is part of
20 Paragraph 9, and then it then goes on to have
21 additional Subparts A through D.

22 A. Okay.

23 Q. It's now highlighted by Mr. Sparks -- and
24 I appreciate that -- in blue, it looks like.

25 A. Any testing, examination, re-examination,

1 evaluation, study, analysis, investigation of the
2 security, integrity, rely -- have we done any of
3 these things?

4 Q. That's --

5 A. No.

6 Q. -- the question.

7 A. No.

8 Q. To your knowledge has the Secretary of
9 State's office done any of these things?

10 A. I don't know.

11 Q. To the best of your knowledge, do you know
12 if the Secretary of State has retained any outside
13 party to engage in any of these activities?

14 A. Not that -- not of which I'm aware. I
15 mean, I've heard that some legislatures -- well,
16 and some legislators have brought in some different
17 voting system vendors that were up for the -- that
18 were under consideration with the S.A.F.E.
19 Commission and that they've brought them in since
20 the November election.

21 Q. Are you familiar with any evaluations or
22 work performed for the Secretary of State by
23 Fortalice?

24 A. No. I've heard the name, and I think -- I
25 think, and I don't remember where it was from, it

1 was -- I think it had to do with something on a --
2 with a computer that they may have looked at at
3 some point, but I'm not familiar with them.

4 Q. In the -- in this suit Alex Halderman
5 of -- one of the leading experts on voting systems,
6 examined the system and found vulnerabilities.
7 Have you ever seen that report?

8 A. I've seen one report that was, like,
9 authored in -- no, it was -- I don't think it was a
10 report. I've seen something that he wrote for the
11 Court in 2019. That's the only thing that I'm --
12 of which I'm aware.

13 Q. Okay. And do you recall what it is that
14 Dr. Halderman said in that report that was provided
15 to the Court?

16 A. It seems like it was basically warning
17 about what he considered to be some of the
18 potential vulnerabilities of the system.

19 Q. And at this point in time, were the -- was
20 the system the D.R.E. system?

21 A. No. I think it was considering the new
22 voting system. And I don't -- I don't know if when
23 he wrote that that the State had already decided
24 upon Dominion's system. That may have been right
25 after they -- the State purchased Dominion.

1 I can't re -- I don't know the exact date
2 in which he submitted that to the Court, but it
3 seemed as though it was pointing out things
4 specific to Dominion.

5 Q. Do you agree or disagree with the various
6 elements that Dr. Halderman set forth in that
7 report that he, in his view, deemed to be
8 vulnerabilities?

9 A. Not -- well, in whatever it was that I
10 read that he wrote in 2019, I don't -- I can't
11 remember what they call those, it wasn't -- they
12 weren't interrogatories. It was more of like a --
13 I can't remember what legal statement it was, but
14 it was, like, 11 pages long.

15 Q. Like an affidavit?

16 A. Yeah. Maybe that was it. I didn't really
17 find anything of concern in what he wrote. Because
18 it just seemed like he was speculating on things
19 that could possibly happen if this, this, this and
20 this were in place, you know.

21 To me it was -- you know, it wasn't
22 anything that caused me concern. But if he's
23 written something since then, I don't know to what
24 you're referring.

25 Q. Okay. And would it be correct to assume

1 that you've not read any recent affidavit from
2 Dr. Halderman that's different from the 2019
3 affidavit that you believe you saw?

4 A. I don't think so. I mean, I don't know
5 what you mean by "recent." But I would say if it
6 was within the last year, definitely I haven't read
7 it. I have not read anything. And if it was in
8 2020, I'm not sure how much I would -- how much
9 attention I would have paid to it or remembered
10 from it.

11 Q. Do you think it's prudent for Fulton
12 County, or for that matter the State of Georgia, to
13 periodically make an attempt to have an outside
14 service to assess whether or not the system has any
15 vulnerabilities?

16 A. Do I think it would serve a purpose for
17 the State to have somebody come in and look at it?

18 Q. Yes.

19 A. No. I mean, not -- I don't know. I just
20 don't -- you know, from what I've seen of the
21 system, you know, yeah, it's got -- it's two --
22 it's expensive and it costs too much money, and
23 it's put an unfunded mandate upon all the counties.

24 I think if you talk to all the big
25 counties, they're going to tell you -- not, maybe

1 think -- yeah, I would -- but I don't -- I mean, I
2 find it kind of hard to speculate on this stuff.

3 Q. Well, you've been hearing a lot of
4 theories for a long time; right?

5 A. Yeah. Maybe my problem is that I seem to
6 trust the people or my colleagues in my county and
7 other counties that, you know, they're going to do
8 the right thing. Maybe anymore after 2020 that's
9 naive, but.

10 Q. I understand that you're no longer the
11 executive director in Fulton County; is that
12 correct?

13 A. I am until April 1st.

14 Q. Okay. Do you anticipate staying in the
15 industry?

16 A. No.

17 Q. May I, if it's not too intrusive, may I
18 ask why not?

19 A. Well, I don't, I mean, I don't really want
20 to deal with -- I mean, most -- some of it has to
21 do with personal life matters, and some of it has
22 to do with I don't have really much respect for the
23 elected officials involved in these things anymore.

24 I mean, you know, I've got -- there seems
25 to be a big group of elected officials out there

1 B.M.D.s used in Fulton County for 2020
2 and 2021 elections."

3 We've talked a little bit about the screen
4 on the B.M.D.s and different systems as to whether
5 or not, when a paper is printed, whether you can
6 compare that back to the what was on the screen in
7 terms of a voter verifying that the paper that's
8 been generated by the B.M.D. is an accurate
9 portrayal of their vote.

10 Do you have any other opinions about
11 whether or not the B.M.D. produces a paper -- a
12 record that a voter can verify?

13 A. Do I have what about the voter record that
14 could be verified?

15 Q. Whether the voter can verify that their
16 individual vote has been accurately recorded by the
17 election system.

18 A. You mean do I -- do I have any views on
19 whether or not the voters -- can you restate, like,
20 the -- a question?

21 Q. I'll be glad to. I'm sorry. It was
22 probably obtuse.

23 Are you aware of any policies implemented
24 by Fulton County to ensure that the voters can
25 verify that the paper ballot generated by the

1 system accurately records their vote?

2 A. No. I mean, we don't have anything in
3 place that says, you know, voters need to -- you
4 need to have the voters, make sure the voters
5 verify what's on their ballot before they deposit
6 it into the scanner.

7 I mean, I think we train poll workers to
8 remind, you know, voters that they can -- you know,
9 to follow the instructions that are on the screen,
10 and before they -- before they put their ballot
11 into a scanner, you know, if they -- if they're
12 unsure that they received the correct ballot, to
13 make sure a poll worker is aware of that before
14 they deposit their ballot in the scanner.

15 Once you put your ballot into a scanner,
16 the -- you know, you've cast it. But we don't do
17 anything actively to tell voters they have to
18 review their ballot for -- to see if it was
19 correct.

20 Q. You're aware that the actual vote is
21 embedded into whatever the, we didn't know whether
22 it was a Q.R. code or just a barcode on the paper
23 that's printed by the B.M.D.; correct?

24 A. Yeah.

25 Q. And so --

1 A. Yeah, there's no way for the voter to
2 verify what's in that. So you know, they just have
3 to -- they're supposed to review their ballots
4 before they put it into the scanner. I mean, I
5 don't know -- I know Alex Halderman did something
6 where he -- it's, like, less than 10 percent of the
7 voters actually do that.

8 That's probably even in line with what --
9 and when I was part of the team that put the system
10 in in Nevada with the VVPATs, you know, most people
11 didn't look -- didn't really spend much time
12 comparing their ballot to the -- what was under the
13 glass.

14 And a lot -- most of them would say, well,
15 we live in Nevada, if somebody's going to try to
16 hack in and steal something, it's not going to be
17 the votes, it's going to be the money, you know.
18 Really, I mean, I mean, it was a lot of voters in
19 Nevada would say that.

20 Q. Well, maybe we don't have as vulnerable of
21 money here, that's why voters are more concerned.

22 And do the same concerns carry over to
23 whether or not the paper that's printed by the
24 B.M.D.s can actually be audited, whether it's a
25 risk-limiting audit or actual recount given the

1 Q.R. -- the code, whatever it is, is where the
2 vote's embedded and not the text at the bottom of
3 the ballot?

4 A. You mean does it -- is it a concern for me
5 that what's in the code, the code is not the same,
6 the Q.R. code is not -- may not be the same as
7 what's printed, the bubbles on the --

8 Q. Yeah.

9 A. -- his mark is not in the bubbles, there's
10 no way for the voter to verify those two things?

11 Q. Yeah. That those two things express the
12 same vote.

13 A. I mean, I think that with you -- if you do
14 a risk-limiting audit, you should be able to verify
15 that. I know some people have different views on
16 what -- how extensive the audit needs to be to
17 verify that.

18 And I don't have a problem with more
19 extensive audit, you know. I don't know. I mean,
20 I guess if you get rid of the Q.R. code and barcode
21 and you use a sys -- oh, I just got a message on
22 my -- can you guys hear me?

23 Q. Yeah.

24 A. Okay. I, you know, I guess it would be --
25 the best thing to do would be for there to be

1 minimal barcodes or Q.R. codes, and then whatever
2 is on the ballot gets scanned somehow, just the
3 content of the ballot. But I don't know what's
4 involved in that.

5 Q. Are you aware that Dominion can provide
6 "ballot on demand" printers?

7 A. That they can provide "ballot on demand"
8 printers? Oh, you mean, like, for early voting
9 locations?

10 Q. Or any application within either early
11 voting or the actual Election Day in-person voting.

12 A. No, it doesn't surprise me that they can
13 do that.

14 Q. And --

15 A. Yeah, I think I knew that.

16 Q. And if the State elected to add this to
17 the current system, that the poll workers could
18 print a ballot, a paper ballot for each voter when
19 they check in?

20 A. And then have them mark it?

21 Q. Yeah. Then you could -- then you could
22 have them mark it, you wouldn't have to have
23 pre-printed ballots ahead of time, but it would
24 allow the voter to use a hand-marked paper ballot
25 and then -- to use that and deposit that into the

1 R E P O R T E R C E R T I F I C A T E
2 STATE OF GEORGIA)
3 COBB COUNTY)

4 I, Debra M. Druzisky, a Certified Court
5 Reporter in and for the State of Georgia, do hereby
6 certify:

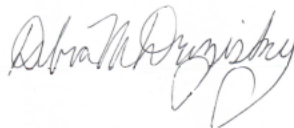
7 That prior to being examined, the witness
8 named in the foregoing deposition was by me duly
9 sworn to testify to the truth, the whole truth, and
10 nothing but the truth;

11 That said deposition was taken before me
12 at the time and place set forth and was taken down
13 by me in shorthand and thereafter reduced to
14 computerized transcription under my direction and
15 supervision. And I hereby certify the foregoing
16 deposition is a full, true and correct transcript
17 of my shorthand notes so taken.

18 Review of the transcript was requested.
19 If requested, any changes made by the deponent and
20 provided to the reporter during the period allowed
21 are appended hereto.

22 I further certify that I am not of kin or
23 counsel to the parties in the case, and I am not in
24 the regular employ of counsel for any of the said
25 parties, nor am I in any way financially interested
in the result of said case.

IN WITNESS WHEREOF, I have hereunto
subscribed my name this 14th day of February, 2022.



Debra M. Druzisky
Georgia CCR-B-1848

1 R E P O R T E R D I S C L O S U R E
2 DISTRICT COURT) DEPOSITION OF
3 NORTHERN DISTRICT) RICHARD BARRON
4 ATLANTA DIVISION)

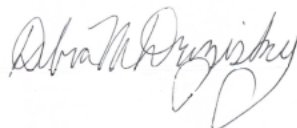
5 Pursuant to Article 10.B of the Rules and
6 Regulations of the Board of Court Reporting of the
7 Judicial Council of Georgia, I make the following
8 disclosure:

9 I am a Georgia Certified Court Reporter.
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